

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEWYORK

-----X
STANISLAW DROZDZ (AND WIFE, MONIKA
DROZDZ),

Case No.:
21 MC 102 (AKH)

Plaintiffs,
-against-

Docket No.: 06CV14620

111 WALL STREET LLC, ET. AL.,

NOTICE OF ADOPTION OF
ANSWER TO MASTER
COMPLAINT

Defendant.

See Rider Attached.

Jury Trial Demanded

-----X

Defendants, BOARD OF MANAGERS OF THE HUDSON VIEW EAST CONDOMINIUM, HUDSON VIEW EAST CONDOMINIUM, by their attorneys, CALLAN, KOSTER, BRADY & BRENNAN, LLP, adopts its Answer to the Master Complaint served by the answering defendants in 21 MC 102 (AKH) as its answer to the allegations set forth in the Complaint by Adoption (Check-Off Complaint). Pursuant to Case Management Order No. 4, this adoption of answer to the Master Complaint is deemed to deny the allegations of the Check-Off Complaint in this case. To the extent that defendants' Answer to the Master Complaint does not comprehensively address any of the specific allegations within the Check-Off Complaint in the above caption matter, defendants deny knowledge or information sufficient to form a belief as to the truth of such specific allegations.

Wherefore, the defendants demand judgment dismissing the above captioned action as against each of them, together with their costs and disbursements..

Dated: New York, New York
September 12, 2007

Yours etc.,

CALLAN, KOSTER, BRADY & BRENNAN, LLP
Attorneys for Defendants - BOARD OF
MANAGERS OF THE HUDSON VIEW EAST
CONDOMINIUM, HUDSON VIEW EAST
CONDOMINIUM

By:


Vincent A. Nagler (6400)
One Whitehall Street
New York, New York 10004
(212) 248-8800

CALLAN, KOSTER,
BRADY & BRENNAN, LLP
COUNSELORS AND
ATTORNEYS AT LAW
One Whitehall Street
New York, New York 10004
212-248-8800

TO: WORBY GRONER & NAPOLI BERN, LLP
Plaintiffs Liaison
In Re Lower Manhattan Disaster Site Litigation
115 Broadway, 12th Floor
New York, New York 10006
(212) 267-3700

RIDER

STANISLAW DROZDZ AND MONIKA
DROZDZ,

Plaintiffs,

- against -

111 WALL STREET LLC, 230 CENTRAL CO.,
LLC, AIG REALTY, INC., ALAN KASMAN
DBA KASCO, AMERICAN INTERNATIONAL
GROUP, INC., AMERICAN INTERNATIONAL
REALTY CORP., AMG REALTY PARTNERS,
LP, BANKERS TRUST COMPANY, BATTERY
PARK CITY AUTHORITY, BLACKMON-
MOORING-STEAMATIC CATASTOPHE, INC.
D/B/A BMS CAT, BOARD OF EDUCATION OF
THE CITY OF NEW YORK, BOARD OF
MANAGERS OF THE HUDSON VIEW EAST
CONDOMINIUM, BROOKFIELD FINANCIAL
PROPERTIES, INC., BROOKFIELD FINANCIAL
PROPERTIES, LP, BROOKFIELD PARTNERS,
LP, BROOKFIELD PROPERTIES
CORPORATION, BROOKFIELD PROPERTIES
HOLDINGS INC., BT PRIVATE CLIENTS
CORP., CITIBANK, NA, CITIGROUP, INC.,
CUSHMAN & WAKEFIELD 111 WALL, INC.,
CUSHMAN & WAKEFIELD, INC.,
DEPARTMENT OF BUSINESS SERVICES,
DEUTSCHE BANK TRUST COMPANY,
DEUTSCHE BANK TRUST COMPANY
AMERICAS, DEUTSCHE BANK TRUST
CORPORATION, ENVIROTECH CLEAN AIR,
INC., GPS ENVIRONMENTAL CONSULTANTS,
INC., HUDSON VIEW EAST CONDOMINIUM,
HUDSON VIEW TOWERS ASSOCIATES,
INDOOR ENVIRONMENTAL TECHNOLOGY,
INC., KASCO RESTORATIONSERVICES CO.,
LIBERTY VIEW ASSOCIATES, L.P., MERRILL
LYNCH & CO, INC., MSDW 140 BROADWAY
PROPERTY L.L.C., NEW YORK CITY SCHOOL
CONSTRUCTION AUTHORITY, ONE WALL
STREET HOLDINGS, LLC., R Y
MANAGEMENT CO., INC., RELATED BPC
ASSOCIATES, INC., RELATED
MANAGEMENT CO., LP, RY MANAGEMENT,
SAKELE BROTHERS, L.L.C, STATE STREET
BANK AND TRUST COMPANY, AS OWNER
TRUSTEE OF ZSF/OFFICE NY TRUST,
STRUCTURE TONE (UK), INC., STRUCTURE

TONE GLOBAL SERVICES, INC., THE BANK
OF NEW YORK COMPANY, INC., THE BANK
OF NEWYORK TRUST COMPANY NA, THE
RELATED COMPANIES, LP, THE RELATED
REALTY GROUP, INC., TISHMAN INTERIORS
CORPORATION, TRIBECA LANDING L.L.C.,
WESTON SOLUTIONS, INC., WFP TOWER D
CO. G.P. CORP., WFP TOWER D HOLDING CO.
I L.P., WFP TOWER D HOLDING CO. II L.P.,
WFP TOWER D HOLDING I G.P. CORP., AND
WFP TOWER D. CO., L.P., ET AL

Defendants.

X
